



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

March 26, 2021

**MEMO ENDORSED**

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VIA ECF

Hon. Valerie E. Caproni  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

**Re: *Ruwanpurage, et al. v. Rosen, et al.*, No. 21 Civ. 517 (VEC)**

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiffs challenge the denial of their Applications for Employment Authorization (Forms I-765) by U.S. Citizenship and Immigration Services (“USCIS”). This action was filed on January 20, 2021, and the summons and complaint were served by mail on March 15, 2021, making the government’s response due May 17, 2021. On behalf of the government, I write respectfully to request, with plaintiff’s consent, that the initial conference presently scheduled for April 2, 2021, *see* ECF No. 3, be adjourned *sine die* (or to the week of June 1 or thereafter).

The adjournment is respectfully requested because the government is still in the early stages of making contact with the relevant USCIS offices and investigating the facts and circumstances underlying the complaint. USCIS has informed me that the applications at issue are processed through USCIS’s Nebraska Service Center and that the Nebraska Service Center already has begun the process of obtaining the necessary files from a different office in Kentucky. The government thus respectfully requests that the conference be adjourned until after the government’s answer is due in order to provide the government with sufficient time to investigate the case and determine how to proceed, including whether the matter can be resolved without further involvement of the Court.

This is the government’s first request to adjourn the initial conference. As noted, plaintiff’s counsel consents to this request. I apologize for making this request one day after the due date for the parties’ pre-conference submissions, which the undersigned had not properly calendared.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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United States Attorney

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cc: Counsel of record (via ECF)

Application GRANTED. The initial pretrial conference is adjourned to **June 11, 2021 at 11:00 a.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 0517. The parties' joint letter is due by **June 3, 2021.**

SO ORDERED.



3/26/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE